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July 28, 2014

VIA ECF AND U.S. MAIL

U.S. District Judge Raymond J. Dearie
U.S. Magistrate Judge Viktor V. Pohorelsky
United States District Court
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Bijoux and Rodriguez, on behalf of themselves and all others similarly situated, v. Amerigroup New York, LLC, 1:14-cv-03891-RJD-VVP (E.D.N.Y)

Dear Judge Dearie:

Our firm represents Defendant Amerigroup New York, LLC (“Amerigroup”) in the above-referenced action. On behalf of Defendant, and pursuant to Your Honor’s Individual Motion Practices and Rules, we submit this letter to respectfully request an extension of time to answer or otherwise respond to Plaintiffs’ Complaint. Plaintiffs served Defendant with the Complaint on July 9, 2014. We calculate our deadline to answer or otherwise respond to the Complaint as being August 4, 2014 (including the 3 day mail extension). We request to extend this deadline by thirty (30) days, up to and including, September 3, 2014.

This is Defendant’s first request for an extension of time to answer or otherwise respond to the Complaint. It is made in good faith, and not for the purpose of causing undue delay. It is sought to provide Defendant with additional time to investigate and respond to the Complaint. No status conferences or hearings will be affected by this request.

We have conferred with Plaintiffs’ counsel, Troy Kessler, who consents to this request. We thank the Court for its attention to this matter.

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Very truly yours,

SEYFARTH SHAW LLP

/s/ Heather Havette

Heather Havette

Attorney for Defendant

(Pro Hac Admission To Be Filed)

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